

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TESCO PLC SECURITIES LITIGATION

Case: 14 Civ. 8495-RMB

HON. RICHARD M. BERMAN

Class Action

**LEAD PLAINTIFF'S REPLY TO COUNSEL'S MEMORANDUM
OF LAW IN OPPOSITION TO LEAD PLAINTIFF'S MOTION
FOR SANCTIONS UNDER RULE 11 (b) (3)**

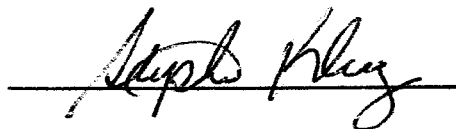
Pursuant to Rule 11 of the Federal Rules of Civil Procedure, Lead Plaintiff Stephen Klug (Plaintiff) respectfully submits this reply to Counsel's Memorandum of Law in Opposition to Lead Plaintiff's Motion for Sanctions Under Rule 11 (b) (3) (the "Opposition").

Counsel's argument in its Opposition regarding the procedural insufficiency of Plaintiff's objection to Counsel's 30% fee request does nothing to change the fact that Counsel was dishonest in failing to disclose to the Court the negative reaction of Plaintiff to the fee request. Counsel compounded this dishonesty with another lie contained in the Declaration of Kim E. Miller in Support of Final Approval of Plan of Allocation of Settlement Proceeds and Lead Counsel's Application for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses

(the "Declaration"). On page 31 of the Declaration, Counsel states that its fee application was submitted with "prior approval of Plaintiff, Mr. Klug". The only communication from Plaintiff to Counsel regarding the fee request was the January 6, 2016 e-mail that plainly objected to the 30% fee. There is no way that the e-mail could be interpreted as an "approval" of anything.

Before he went to jail, the class action attorney William Lerach was famously quoted as saying "I have the greatest practice of law in the world. I have no clients." Counsel in this case has put a new twist on the Lerach theme. Because they were unhappy with the real client's reaction to their 30% fee request, they invented an "imaginary" client who not only didn't object to the request, but also "approved" their revised 20% request. This Court should send a message to Counsel, in the form of Rule 11 sanctions, that such dishonesty will not be tolerated.

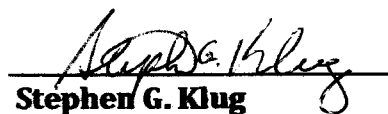
Dated: May 20, 2016

A handwritten signature in black ink, appearing to read "Stephen Klug", is written over a horizontal line.

Stephen Klug
1308 Seaspray Lane
Sanibel, Fl. 33957
Telephone: (216) 409-7842
S1klug@aol.com

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2016, I mailed the foregoing to Kim E. Miller, 250 Park Avenue, Suite 2040, New York, NY 10177 and that I also sent it via E-mail to Kim.miller@ksfcounsel.com.


Stephen G. Klug